

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

SEP 17 2019

UNITED STATES OF AMERICA,

)

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT - WESTERN DIST. OKLA.
BY ae, DEPUTY

Plaintiff,

)

-vs-

) No.

CR-19 297 R

NICHOLAS ANTHONY GEIB,

) Violations: 18 U.S.C. § 922(o)
) 18 U.S.C. § 922(g)(1)
) 26 U.S.C. § 5861(d)
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Defendant.) 18 U.S.C. § 924(d)
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I N D I C T M E N T

The Federal Grand Jury charges:

COUNT 1
(Unlawful Possession of a Machine Gun)

On or about August 29, 2019, in Yukon, Oklahoma, in the Western District of Oklahoma,

----- **NICHOLAS ANTHONY GEIB** -----

did knowingly possess a machine gun, as defined in Title 18, United States Code, Section 921(a)(23) and Title 26, United States Code, Section 5845(b). Specifically, **NICHOLAS ANTHONY GEIB** knowingly possessed a Glock conversion switch, that is, a part designed and intended solely and exclusively, or a combination of parts designed and intended, for use in converting a weapon into a machine gun.

All in violation of Title 18, United States Code, Section 922(o), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 2
(Felon in Possession of a Firearm)

On or about August 29, 2019, in Yukon, Oklahoma, in the Western District of Oklahoma,

----- **NICHOLAS ANTHONY GEIB**, -----
with knowledge that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly and unlawfully possessed a firearm, to wit: a model 870 Remington shotgun, bearing serial number RF83853A, which was in and affecting interstate commerce in that said firearm had previously crossed state lines or traveled in foreign commerce to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(1), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 3
(Felon in Possession of a Firearm)

On or about August 29, 2019, in Yukon, Oklahoma, in the Western District of Oklahoma,

----- **NICHOLAS ANTHONY GEIB**, -----
with knowledge that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly and unlawfully possessed the following firearms:

1. a Glock 43 model pistol, bearing serial number BASP459 and

2. an FN .45 caliber handgun, bearing serial number FX3U099006, which were in and affecting interstate commerce in that said firearms had previously crossed state lines or traveled in foreign commerce to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(1), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

COUNT 4
(Possession of an Unregistered Firearm)

On or about August 29, 2019, in Yukon, Oklahoma, in the Western District of Oklahoma,

----- **NICHOLAS ANTHONY GEIB** -----

knowingly possessed a tan in color, 9mm Luger short barreled rifle, with a 6.5 inch barrel and no manufacturing markings or serial number, a weapon made from a rifle, to wit: a rifle modified to a firearm with a barrel of less than sixteen inches, which was not registered to the defendant in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Section 5861(d), the penalty for which is found at Title 26, United States Code, Section 5871.

FORFEITURE

The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of any of the offenses alleged in Counts 1, 2, and 3 of this Indictment, **NICHOLAS ANTHONY GEIB** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense.

Upon conviction of the offense alleged in Count 4 of this Indictment, **NICHOLAS ANTHONY GEIB** shall forfeit to the United States pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461(c), any firearms involved in the commission of the offense.

The property subject to forfeiture includes, but is not limited to:

1. 9mm AR pistol (no serial number);
2. 9mm magazine (30 round capacity);
3. .380 caliber ammunition (120);
4. .22 caliber ammunition (31);
5. .40 caliber ammunition (20);
6. 12 gauge ammunition (2);
7. .338 Lupua brass casings (250);
8. .223 caliber ammunition (1,053);
9. Valkyrie .224 caliber ammunition (20);
10. 6.5mm Grendel ammunition (40);
11. 6.5mm Creedmoor ammunition (9);
12. 300 WinMag ammunition (20);
13. 50 caliber ammunition (20);

14. 300 Blackout ammunition (10);
15. Magnum .357 caliber ammunition (8);
16. .40 caliber ammunition (24);
17. .380 caliber ammunition (10);
18. Magnum .357 caliber ammunition (32);
19. .22 caliber ammunition (270);
20. 9mm ammunition (284);
21. 12 gauge ammunition (140);
22. unknown plastic piece;
23. Burris Fast Fire 3 sight, bearing serial number: AAKA196448;
24. 9mm magazine (27 round capacity);
25. magazine attachment;
26. Savage Arms .22 caliber rifle, bearing serial number: 2354733;
27. Glock 43 model pistol, bearing serial number: BASP459;
28. Kimber Micro Carry .380 caliber, bearing serial number: M00134S O;
29. polymer 80 homemade handguns (3) (no serial number);
30. FN .45 caliber handgun, bearing serial number: FX3U099006;
31. 9mm magazines (2-30 round capacity);
32. .45 caliber drum magazine (28 round capacity);
33. Red Dot Sight (2);
34. pistol laser;
35. 300 Blackout magazine (50 round capacity);

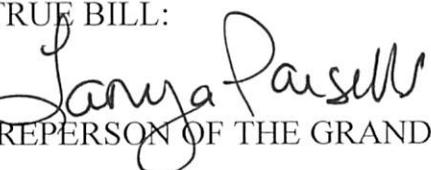
36. .380 caliber ammunition (57);
37. 9mm ammunition (41);
38. .410 caliber shotgun shells (21);
39. 300 Blackout ammunition (59);
40. .45 caliber ammunition (49);
41. .45 caliber magazines (3-15 round capacity);
42. AR lowers (4);
43. pistol lowers (4);
44. unfinished firearm (no serial number);
45. pistol caliber upper (no serial number);
46. 6.5mm Creedmoor rifle (no serial number);
47. ballistic vests (2);
48. 6.5mm Creedmoor ammunition (10);
49. 6.5mm magazine (10 round capacity);
50. polymer pistol frame kit;
51. Grey Ghost Precision slide;
52. muzzle brake;
53. 9mm magazine (8 round capacity);
54. 9mm magazines (5-17 round capacity);
55. 12 gauge shotgun shells (2);
56. .380 caliber magazine;
57. GGP limited edition 9mm (no serial number);

58. 300 Blackout ammunition (7);
59. 9mm ammunition (48);
60. .410 caliber ammunition (25);
61. lower receivers (2);
62. .223 magazine (30 round capacity);
63. 12 gauge ammunition (12);
64. .40 caliber magazine (11round capacity);
65. .223 caliber magazines (11-30 round capacity);
66. .223 caliber ammunition (68);
67. AR lowers (7) (no serial numbers);
68. 7.62 mm magazine (30 round capacity);
69. 9mm magazines (2-17 round capacity);
70. 9mm ammunition (8);
71. .45 caliber ammunition (11);
72. .45 ACP rounds (4);
73. suppressor;
74. .45 caliber magazine (13 round capacity);
75. AR upper (no serial number);
76. 300 Blackout ammunition (9);
77. pistol kits (8);
78. rifle kits (3);
79. 12 gauge ammunition (45);

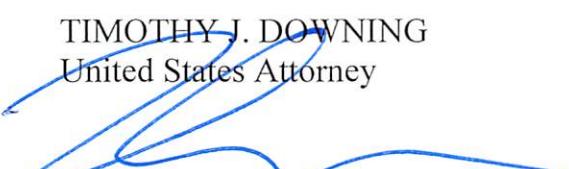
80. 12 gauge magazines (2-10 round capacity);
81. Savage .223 caliber rifle, bearing serial number: J896937;
82. Red .223 caliber rifle (no serial number);
83. .223 magazine (10 round capacity);
84. Cabela's gun case;
85. .223 caliber magazine (5 round capacity);
86. Glock conversion switch (4);
87. AR platform rifle with ammunition and magazine;
88. suppressor housings (14);
89. 37mm ammunition (4);
90. 870 Remington shotgun, bearing serial number RF83853A;
91. unknown test round (1); and
92. training grenade (1).

All pursuant to Title 18, United States Code, Section 924(d); Title 26, United States Code, Section 5872; and Title 28 United States Code, Section 2461(c).

A TRUE BILL:


Lanya Parsell
FOREPERSON OF THE GRAND JURY

TIMOTHY J. DOWNING
United States Attorney


THOMAS B. SNYDER
Assistant United States Attorney